

1 PHOEBE V. REDMOND, ESQ.
2 Nevada Bar No. 9657
3 CLARK COUNTY SCHOOL DISTRICT
4 OFFICE OF THE GENERAL COUNSEL
5 5100 West Sahara Avenue
6 Las Vegas, Nevada 89146
7 Tel: (702) 799-5373
8 Fax: (702) 799-5505
9 redmopv@nv.ccsd.net
10 *Attorney for Clark County School District*

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

O.R., by and through her Parents, Sig and
Lori Rogich and Sig and Lori Rogich,
Individually,

Plaintiffs,

v.

CLARK COUNTY SCHOOL DISTRICT,

Defendant.

CASE NO.: 2:17-cv-01541-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
PLAINTIFFS' MEMORANDUM
DETAILING RELIEF SOUGHT,
FILED PURSUANT TO ECF No. 73
(First Request)**

COMES NOW, Plaintiff and Defendant Clark County School District ("the CCSD"), by
and through their attorneys of record, and hereby stipulate and agree that the CCSD may have up
to and including September 7, 2020, to respond to **PLAINTIFFS' MEMORANDUM
DETAILING RELIEF SOUGHT, FILED PURSUANT TO ECF No. 73** (hereinafter referred
to as "the Memorandum") in this matter. The Court ordered that the Motion be served and was
served on August 17, 2020. The current response date is August 31, 2020. This is the first
request for an extension to the response due date.

1 This request is being entered for good cause, in good faith, and not for reason of delay.

2 On or about, Thursday, August 27, 2020, the CCSD's document server was hacked causing it to
3 become inaccessible. As of today's date, the server continues to be inaccessible although steps
4 have been taken to correct the situation. CCSD's counsel has been actively working on a response
5 to the Memorandum, however, completion of the CCSD's response has been significantly
6 hampered by her ability to access essential documents held on the document server.
7

8
9 THEREFORE, the parties respectfully request the response due date be extended seven (7)
10 days up to and including September 7, 2020.

11 Dated: August 31, 2020.

Dated: August 31, 2020.

12 CLARK COUNTY SCHOOL DISTRICT
13 OFFICE OF THE GENERAL COUNSEL

FREEMAN LAW OFFICES, LLC

14 /s/ Phoebe V. Redmond
15 PHOEBE V. REDMOND, ESQ.
16 Nevada Bar No. 9657
17 5100 West Sahara Avenue
18 Las Vegas, Nevada 89146
Attorney for Defendant, CCSD

/s/ Hillary D. Freeman
HILLARY D. FREEMAN, ESQ.
N.J. Attorney I.D. No. 002362006
(Admitted *Pro Hac Vice*)
103 Carnegie Center, Suite 101
Princeton, New Jersey 08540
Attorneys for Plaintiffs

19
20
21
22 **IT IS SO ORDERED.**

23
24 
25 **RICHARD F. BOULWARE, II**
26 **UNITED STATES DISTRICT JUDGE**

27 DATED this 31st day of August, 2020.
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 31st day of August, 2020, I filed and served the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO PLAINTIFFS' MEMORANDUM DETAILING RELIEF SOUGHT, FILED PURSUANT TO ECF No. 73 (First Request)** with the Clerk of the Court using the ECF system which served the parties hereto electronically.

Hillary D. Freeman, Esq.
Catherine Merino Reisman, Esq.

Attorneys for Plaintiffs

/s/ Eva Martinez
An employee of the Office of the
General Counsel, CCSD